## BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

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POSTAL RATE GONTHOSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

## MOTION OF THE UNITED STATES POSTAL SERVICE FOR LEAVE TO DELAY RESPONSE TO ORDER NO. 1289

In Order No. 1289 (March 28, 2000), the Commission requested the Postal Service to file, on or before April 14, 2000, additional evidence addressing specific topics related to the history of Periodicals and flats mail processing costs. The Order was supplemented by Presiding Officer's Ruling 2000-1/31 (April 7, 2000), which expanded the scope of the Commission's inquiry to include an additional topic related to the productivity of particular flat sorting equipment. Yesterday, on April 13, 2000, during Commission hearings in this docket, Postal Service witness Kingsley was cross-examined on matters substantially related to these topics, including numerous questions from the bench.

The Postal Service would like an opportunity to review the transcript of witness Kingsley's testimony before completing the written testimony responding to Order No. 1289. Additional time is also needed to permit adequate internal review by Postal Service management. Accordingly, the Postal Service gives notice that it will not be able to file the requested testimony today, but rather moves for leave to submit it

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Eric P. Koetting

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Eric P. Koetting

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